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10 Attorneys for Kristopher Lee Dallmann

11 **IN THE UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**
13

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 KRISTOPHER LEE DALLMANN,
18 Defendant.

Case No. 2:22-cr-00030-RFB-01

**Motion for Leave to File Under Seal
Defendant's Sentencing Memorandum
and Objections to Final PSR**

19 Undersigned counsel respectfully requests this Court permit the attached Sentencing
20 Memorandum and Objections to Final PSR be filed under seal because it provides medical
21 information regarding Kristopher Dallmann's mental and physical health diagnoses and
22 treatment plans. As such, disclosure of the fact and nature of the information in these records
23 are protected by HIPAA.

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1 For the foregoing reasons, Mr. Dallmann respectfully requests leave to file under seal
2 the Sentencing Memorandum and Objections to Final PSR and further requests that the Court
3 maintain them under seal.

4 DATED this 15th day of October, 2024.

5 RESPECTFULLY SUBMITTED,

6 RENE L. VALLADARES
7 Federal Public Defender

8 By:

/s/ Kevin A. Tate

9 KEVIN A. TATE
10 Litigation Resource Counsel
11 Assistant Federal Public Defender
12 Counsel for Kristopher Dallmann

13 IT IS SO ORDERED:

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15 RICHARD F. BOULWARE, II
16 United States District Judge
17 Dated 10/16/2024
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CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on October 15, 2024, he served an electronic copy of the above and foregoing Motion for Leave to File Under Seal Defendant's Sentencing Memorandum and Objections to Final PSR by electronic service (ECF) to the person named below:

Jessica Oliva
U.S. Attorney's Office
501 Las Vegas Blvd South
Suite 1100
Las Vegas, NV 89101
Email: jessica.oliva@usdoj.gov

/s/ Jeremy Kip _____
Employee of the Federal Public Defender